

PINNACLES TELEPHONE COMPANY

340 LIVE OAK RD PAICINES, CA 95043 (831) 389-4500

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date filed: 1-15-2009

Name of company covered by this certification: Pinnacles Telephone Co

Form 499 Filer ID: 803367

Name of signatory: Steven R Bryan, Jr.

Title of signatory: Secretary

I, Steven R Bryan, Jr., certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 et seq.

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what steps companies are taking to protect CPNI.

PinTel has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signed



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STATEMENT

Pinnacles Telephone Company (PinTel) has established operating procedures that ensure compliance with the Federal Communications Commission (FCC) regulations regarding the protection of Customer Proprietary Network Information (CPNI).

PinTel has implemented a system whereby customers' directives regarding their CPNI can be determined prior to its release or use. Occasionally, when incidental discussions involving a customer's CPNI are conducted over a telephone line (rather than by mail), the identity of the customer is verified by either personal knowledge of the individual or by call-back at their telephone number of record.

PinTel does not provide public access to customers' records (including CPNI) via the internet nor by dialup to a computer.

PinTel continually educates and trains its employees regarding the appropriate treatment of CPNI. PinTel has established disciplinary procedures should an employee violate the CPNI procedures established by PinTel.

PinTel is not affiliated with any business entity, does not perform sales or marketing campaigns and does not provide CPNI to any entity aspiring to do so.

There were no data broker incidents at PinTel in 2008.